

REMARKS/ARGUMENTS

Claims 6, 7, 8, 9, and 10 are currently rejected under a combination of Miyahara and Hehl.

Applicant recognizes that the present invention produces an apparatus that is functionally similar to prior art two-shot injection molding machines known in the art. Nevertheless, Applicant respectfully traverses this rejection based on the fact that the claims are not for an apparatus but for a method of retrofitting pre-existing single-shot injection molding machines with a second injector. The method works, as any commercially successful retrofitting process must, with a wide variety of injection molding machines from a wide variety of manufacturers.

The cited art does not suggest or teach the possibility of retrofitting a second injector to an injection molding machine. The word "retrofitting" or similar terms are nowhere found in the Hehl or Miyahara references, nor is any teaching or suggestion of retrofitting or the possibility of a retrofitting method.

A closer look at the Hehl and Miyahara references shows devices which teach away from the only practical method of retrofitting a second injection presently known to the inventors or others, that is, the mounting of the second injector on the platens normally used for holding the mold halves. The Miyahara reference shows mounting of a second injector on an oversized base that is not a platen and which would not be found on most single injector machines. The Hehl reference shows a mounting of a second injector on a box-shaped casing on special flanges 53 and 52 unique to the Hehl machine and behind the mold clamping plate 34 which provides the platen for holding the mold. Thus even the combination of Hehl and Miyahara does not provide the elements of claim 6 in which an injector is in fact mounted on the platen.

Applicant does not believe that a person of ordinary skill in the art reviewing these references would fairly be led to the idea of producing a retrofittable injector or the method steps of retrofitting an injector as claimed by the present invention. In this regard, Applicant has submitted an affidavit of commercial success which provides strong evidence that the present invention was not obvious to those of skill in the art at the time of its introduction by the present inventors. The affidavit describes the actions of competitors to copy the platen-

mounting of the present invention to introduce their own retrofitting product, after claiming a retrofit injector was impossible or impractical, but then seeing the present invention in the market. The affidavit describes a platen-mounted retrofittable injector identical to that claimed in the present invention that has become a commercial success with essentially no promotion or advertising.

In light of these remarks, previous amendments, and the facts recited in the affidavit of commercial success, Applicant believes that claims 6, 7, 8, 9, and 10 are in condition for allowance is respectfully requested.

Respectfully submitted,

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